

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
CENTRAL VALLEY REGION**

N JOAQUIN WATERSHED BRANCH OFFICE:  
14 EAST ASHLAN AVENUE  
FRESNO, CALIFORNIA 93726  
PHONE: (209) 445-5116



4 April 1988

Mr. Larry Bright  
Valley Waste Disposal Company  
1400 Easton Dr.  
Suite 139-B  
Bakersfield, CA 93309

**NOTICE OF NONCOMPLIANCE**

The Water Quality Control Plan, Tulare Lake Basin, 5D (Basin Plan) was developed to establish water quality standards to serve as guides for developing waste discharge requirements (WDRs). A section of the Basin Plan titled, Policy on Oil Field Wastewater Disposal, includes a requirement that "Maximum salinity limits for wastewaters in unlined sumps overlying the usable ground water body will be 1000 E.C., 200 mg/l chlorides, and 1 mg/l boron."

As a result of an analysis of water samples taken during a recent inspection (see enclosed inspection report) your facility in the Edison oil field was found not to be in compliance with the above salinity limits. Regional Board staff are in the process of reviewing all oil field disposal practices within the Tulare Lake Basin, which includes the southern San Joaquin Valley. In the future the Regional Board will be updating WDRs and issuing enforcement orders, as appropriate, to operators whose facilities are not in compliance with the Basin Plan and/or other State regulations. Therefore, in the near future you need to determine how you will obtain compliance.

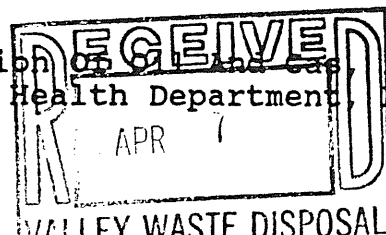
Disposal methods which afford optimal protection of water quality include: 1) Deep well injection in accordance with a plan approved by the California Division of Oil and Gas; 2) disposal to lined impoundments constructed in accordance with the prescriptive standards of Title 23, California Code of Regulations, Sections 2510 - 2601 (Subchapter 15) and; 3) trucking the wastewater to an approved disposal site.

If you have any questions, please call Cliff Raley of this office at (209) 445-5145.

*William F. Pfister*  
William F. Pfister  
Senior Engineering Geologist

Enclosure

cc: Mr. Hal Bopp, California Division of Oil and Gas, Bakersfield  
Mr. Vern Reichard, Kern County Health Department, Bakersfield



## FACILITIES INSPECTION REPORT

SWRCB 001 (NEW 6-87)

ADDITIONAL INFORMATION SHOULD BE ATTACHED TO ORIGINAL

1. WDS NUMBER (Must be 11 digits) 152013013		2. NAME OF AGENCY RESPONSIBLE FOR DISCHARGE VALLEY WASTE DISPOSAL COMPANY	
INSPECTION COMPLETED Year Mo. Day 87 11 12		4. NAME OF FACILITY EDISON Kern County	
5. INSPECTION TYPE (Check One)			

- A1 ☒ "A" type compliance—Comprehensive inspection in which samples are taken.
- B1 ☐ "B" type compliance—A routine nonsampling inspection.
- D2 ☐ Noncompliance follow-up—Inspection made to verify correction of a previously identified violation.
- D3 ☐ Enforcement follow-up—Inspection made to verify that conditions of an enforcement action are being met.
- D4 ☐ Complaint—Inspection made in response to a complaint.
- D5 ☐ Pre-requirement—Inspection made to gather information relative to preparing, modifying, or rescinding requirements.
- D6 ☐ Miscellaneous—Any inspection not mentioned above.

## NPDES

5. INSPECTION BY <input type="checkbox"/> State <input type="checkbox"/> State/EPA Joint		7. IS EPA INSPECTION REQUIRED? <input type="checkbox"/> Yes <input type="checkbox"/> No	
8. DID YOU TAKE A BIOASSAY SAMPLE? <input type="checkbox"/> Yes <input type="checkbox"/> No		9. IF A BIOASSAY SAMPLE WAS TAKEN, WAS IT: <input type="checkbox"/> Static <input type="checkbox"/> Flowthrough	

## 10. INSPECTION COMMENTS SUMMARY—REQUIRED (100 Character Maximum)

Violations were noted during the inspection. However, Lab results indicated violations.

1. WAS THERE A VIOLATION?  
☒ Yes (Complete violation form.) ☐ No ☐ Pending (e.g., lab results)

2. INSPECTOR'S  
INITIALS → EICR

## ADDITIONAL COMMENTS

Please see attachment)

The Edison facility is located in Section 24, T29S/R29E, MDB&M, and north of Breckenridge Road approximately 1 mile northeast of Comanche Road. The facility's ponds are distributed in three canyons in the northwest quarter of the section. The ponds are surrounded by tamarisk trees and grass.

The facility was toured with the manager of Valley Waste, Mr. Larry Bright. The tour began in the South Canyon and proceeded uphill to a ridge, overlooking South and Center Canyons, where the effluent from the Edison Oil Field is initially discharged. There are three ponds located on top of this ridge. The first two ponds had accumulations of oil on the water surface, but the third pond had very little oil accumulation on it. Water is conveyed to each of the three canyons by a series of valves located on the ridge. Around the southern perimeter of Center Canyon wastewater is used for the irrigation of pasture.

Water in the ponds located within the canyons had no visible accumulations of oil. A water sample was taken from pond No. 4 located in North Canyon. The results of the chemical analyses are listed below along with maximum allowable concentrations as specified in Regional Board Order No. 58-349:

<u>CONSTITUENT/ CHARACTERISTIC</u>	<u>MAXIMUM ALLOWABLE CONC (or EC)</u>	<u>MEASURED VALUE</u>
Boron	1.0 mg/l	19.0 mg/l
Chloride	150 mg/l	2083 mg/l
E. C.	-----	9000 umhos/cm
T. D. S.	1000 mg/l	3020 mg/l

Waste discharge requirements need to be prepared which reflect current policies and water quality criteria listed in the Basin Plan.

**RESOLUTION  
WASTE DISCHARGE REQUIREMENTS**

**RACE TRACK HILL AREA, EDISON OIL FIELD  
KERN COUNTY**

**RESOLUTION No: 58-349**

**ADOPTED: SEPT. 18, 1958**

**WHEREAS, THE RACE TRACK HILL AREA IS LOCATED IN THE NORTHEAST PORTION OF THE EDISON OIL FIELD APPROXIMATELY EIGHT MILES EAST OF BAKERSFIELD; AND**

**WHEREAS, WASTE WATER FROM THE PRODUCTION OF OIL IN THIS AREA IS OF POOR MINERAL QUALITY, HIGH IN BORON AND CHLORIDE CONTENT, AND CONSIDERABLY INFERIOR TO LOCAL GROUND WATER; AND**

**WHEREAS, THE LOCAL GROUND WATER IS USED EXTENSIVELY FOR DOMESTIC AND IRRIGATION PURPOSES AND IS OF SATISFACTORY QUALITY FOR THESE USES; AND**

**WHEREAS, THE DISPOSAL OF WASTE WATER TO THE ALLUVIUM IN THIS AREA CONSTITUTES A THREAT OF POLLUTION TO THE USEABLE GROUND WATER; AND**

**WHEREAS, RESOLUTION No. 57-16 WAS ADOPTED BY THE CENTRAL VALLEY REGIONAL WATER POLLUTION CONTROL BOARD ON 10 JANUARY 1957, STATING "THAT NO THREAT OF GROUND WATER POLLUTION WILL EXIST IN THIS AREA SO LONG AS WASTE WATERS FROM THE RACE TRACK HILL AREA OF THE EDISON OIL FIELD ARE DISPOSED OF BY MEANS OF INJECTION INTO SALINE WATER-BEARING FORMATIONS BELOW THE BASE OF THE FRESH WATER OR BY MEANS OF PERCOLATION INTO PERMEABLE MIOCENE FORMATIONS WHICH DIP BELOW THE USEABLE GROUND WATER LEVELS;" AND**

**WHEREAS, SHELL OIL COMPANY DESIGNED A COMPLETE INJECTION SYSTEM BUT WERE UNABLE TO GET PERMISSION FROM THE LAND OWNERS TO INJECT THE WASTE WATER AND IT WAS FELT THAT THEIR POSITION WAS WEAK BECAUSE OF THE GEOLOGICAL STRUCTURE WITH NUMEROUS FAULT BLOCKS WHICH OFFERED AN OPENING FOR FUTURE LEGAL LIABILITY; AND**

**WHEREAS, VALLEY WASTE DISPOSAL COMPANY, AS REPRESENTATIVE FOR THE OPERATORS IN THE AREA, HAS ATTEMPTED TO PURCHASE OR OBTAIN A LONG TERM LEASE FOR LAND ON WHICH TO CONSTRUCT AND OPERATE PERCOLATION PONDS ON THE OUTCROP OF THE MIOCENE FORMATION NORTHEAST OF THE RACE TRACK HILL AREA BUT WERE UNABLE TO MAKE ANY REASONABLE NEGOTIATIONS; AND**

**WHEREAS, VALLEY WASTE DISPOSAL COMPANY HAS RECEIVED OFFERS FROM THE OWNERS OF THE W 1/2 AND SE 1/4 OF SEC. 24, T29S, R29E, MDB&M FOR PROPERTY ON WHICH TO CONSTRUCT AND OPERATE SUCH PERCOLATION PONDS; AND**

**WHEREAS, THIS PROPERTY IS LOCATED APPROXIMATELY THREE MILES NORTH EAST OF THE RACE TRACK HILL AREA ADJACENT TO THE OUTCROP OF THE MIOCENE FORMATION; AND**

**WHEREAS, THIS AREA IS CHARACTERIZED BY RELATIVELY BARREN HILLS WHICH ARE USED ALMOST EXCLUSIVELY FOR LIVESTOCK GRAZING; AND**

**WHEREAS, THERE ARE NO FRESH WATER PRODUCING WELLS IN THIS VICINITY; AND**

RACE TRACH HILL AREA, EDISON OIL FIELD  
KERN COUNTY

- 3 -

IF THERE ARE ANY FUTURE CHANGES IN THE CONDITIONS OF DISCHARGE OR USE OF THE DISPOSAL AREA, IT MAY BE NECESSARY FOR THE CENTRAL VALLEY REGIONAL WATER POLLUTION CONTROL BOARD TO REVISE THESE REQUIREMENTS TO CONFORM TO THE NEW CONDITIONS OR USE.

THESE REQUIREMENTS DO NOT AUTHORIZE THE COMMISSION OF ANY ACT RESULTING IN THE INJURY TO THE PROPERTY OF ANOTHER OR PROTECT THE DISCHARGER FROM HIS LIABILITIES UNDER FEDERAL, STATE OR LOCAL LAWS.

/s/ CLIFFORD E. PLUMMER

CHAIRMAN

ATTEST:

/s/ JOSEPH S. GORLINSKI  
EXECUTIVE OFFICER

